

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

Case No.: 16-bk-12356-jlg

Chapter 13

NEELAM TANEJA,

Debtor,

Adversary Proc. No.: 17-ap-01027-cgm

vs.

THE HEALTH LAW FIRM, et al.,

Creditor/Defendant.
-----X

ATTESTATION AS TO ATTORNEY'S FEES AND COSTS ASSOCIATED WITH
ADVERSARY PROCEEDING

BY MICHELLE WILLIAMS, ASSISTANT BOOK KEEPER

I the undersigned, Michelle Williams, being duly sworn, do hereby depose and attest:

1. I am over eighteen years of age, of sound mind, and otherwise competent to testify to the contents of this affidavit. I have personal knowledge of the Plaintiff's books and records. The statements contained herein are based on my personal knowledge.

2. I am the Assistant Book Keeper of The Health Law Firm, P.A., f/k/a George F. Indest III, P.A. - The Health Law Firm, a Florida professional service corporation. I also function in all capacities as the Firm's Book Keeper whenever the Book Keeper is not present. I have been an employee of The Health Law Firm for four years. I am the custodian of the accounts receivable files, bills and invoices, including timekeeping records, of The Health Law Firm, P.A.

3. Attached are two invoices from The Health Law Firm that document the time spent by the legal professionals involved, and the costs spent, in defending the Adversary Proceeding filed by Neelam Taneja Uppal in this matter. (Affidavit Exhibits A and B.) I have also prepared a summary of each invoice and placed them on top of each invoice. (Affidavit Exhibits A and B.)

4. The invoices attached are kept in the regular course of the business of The Health Law Firm. The times and costs entered are entered contemporaneously, at the time they are



actually performed or incurred. These entries are made by the attorneys and legal professionals who have direct knowledge of the matters. They are later checked again by them for accuracy, before they are finalized. It is part of the regular conduct of the business of The Health Law Firm to make such records. These records are relied upon by The Health Law Firm and our clients and insurance companies that pay these bills.

INVOICE NO. 1:

5. Invoice Number 1 attached (invoice #41870) originally contained time and costs for both the main bankruptcy action and the Adversary Proceeding. (Affidavit Exhibit A.) We have deleted the time and costs for the main bankruptcy action and just included time and costs for the Adversary Proceeding. Originally, Mr. Indest's time on Invoice Number 1 was being billed at \$550 per hour which was his regularly hourly rate at the time that case was opened. We have recalculated Mr. Indest's legal fees at the reduced hourly rate of \$475.00 per hour which was his hourly rate at the time Neelam Taneja Uppal originally contracted with this firm to provide legal services to her in or around June 2012. This summary was prepared by Jill Benoit, the Book Keeper.

INVOICE NO. 2:

6. Invoice Number 2 attached contains only fees and costs incurred in the Adversary Proceeding. (Affidavit Exhibit B.) In it Mr. Indest's is billed at the reduced hourly rate of \$475.00 per hour which was his hourly rate at the time Neelam Taneja Uppal originally contracted with this firm. There is a summary sheet I have prepared and it is attached. (Affidavit Exhibit B.)

7. The one exception to te above is that Mr. Indest has included 11.0 hours of time on Invoice No. 2 to reflect his expected travel time and hearing time that will be required to be spent for the hearing scheduled July 13, 2017. These are the last three entries on Invoice No. 2 and they are marked with an asterisk.

8. The attached records are true and correct and are the business records of The Health Law Firm.

9. The total amount of time spent on this matter just by Mr. Indest alone, as shown in Invoice No. 1 and Invoice No. 2 (Affidavit Exhibits A and B), is:

Invoice No. 1:	29.2 hours	X	\$475/hr.	=	\$13,870.00.
Invoice No. 2:	74.6 hours	X	\$475/hr.	=	\$35,435.00
Invoice No. 2 (projected):	11.0 hours	X	\$475/hr	=	5,225.00
<hr/>					
Total	114.8 hrs	X	\$475/hr	=	\$54,530.00

This time was all for the Adversary Proceeding.

SUMMARY SHEET FOR ADVERSARY ACTIVITIES ONLY - FROM INVOICE 1

(Only From Invoice No.: 41870, 2/21/2017 through 4/18/17) =B

Neelam Uppal v. Health Law Firm George Indest; Bankruptcy Case No.: 16-12356-jlg;
Adversary Proceeding No.: 17-01027-jlg

LEGAL PROFESSIONAL FEES FOR ADVERSARY PROCEEDING ONLY:

<u>Init.</u>	<u>Name</u>	<u>Position</u>	<u>Hrs.</u>	<u>Rate</u>	<u>Amount</u>	<u>Rate</u>	<u>Amount</u>
GFI	George F. Indest III	Managing Partner	29.2	\$550/hr	\$16,060.	\$475/hr	\$13,870.00
CCS	Carole Schriefer, R.N., J.D.	Attorney	0.2	\$450/hr	\$90.00		
TM	Tina Mesibov	Paralegal	4.9	\$150/hr	\$735.00		
CH	Christopher Holdorf	Paralegal	2.7	\$150/hr	\$405.00		
SE	Shelly Estes	Paralegal	1.0	\$150/hr	\$150.00		
SG	Shannon Gentry	Paralegal	0.3	\$150/hr	\$45.00		

TOTAL HOURS: 38.3 at Regular Rates above (From Invoice 1, #41870, only)

AVERAGE RATE/HR: \$456.53/hour at Regular Rates above (Invoice 1, #41870, only)

TOTAL FEES AMOUNT: \$17,485.00 at Regular Rates above (Invoice 1, #41870, only)

AMOUNT OF MR. INDEST'S FEES ALONE: \$16,060.00 (Invoice 1, #41870, only)

**AMOUNT OF MR. INDEST'S FEES ALONE AT REDUCED RATE OF
\$475./hr (Invoice 1, #41870, only): \$13,870.00**

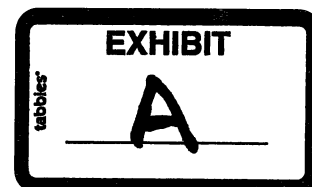
The above was compiled and calculated by:



JILL BENOIT, BOOKKEEPER
THE HEALTH LAW FIRM

7/11/17

Invoice No. 1



The Health Law Firm
1101 Douglas Avenue
Altamonte Springs, FL 32714
Telephone: (407) 331-6620
Tax ID No.: 59-3609071

Invoice submitted to:
Neelam Uppal, M.D.
COLLECTIONS CASE

April 24, 2017

*Invoice #1 for
Adversary Proceeding*

In Reference To: File No. : 1516/006X
New York Bankruptcy

Invoice #41870

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2016 SE	Receive Motion for Default Final Judgment Against Justin Petro dated August 15, 2016, from Pinellas County Clerk of Court. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
AJM	Review/analyze the 341 Meeting of the Creditors Notice and all prior filings of Bankruptcy by the Defendant to analyze whether the automatic stay is still applicable to the current collection case and whether we can proceed with our collection efforts.	1.30 350.00/hr	455.00
8/25/2016 AJM	Contacted Chapter 13 Trustee Jon Waag of the Middle District of Florida and Chapter 13 Trustee Jeff Sapir of the Southern District of New York in regards to the frivolous bankruptcy filings made by Uppal. Ms. Uppal is not protected by the Automatic Stay, so if assets are located potential to file judgment and make debt a secured debt.	0.50 350.00/hr	175.00
8/29/2016 SE	Receive Certificate of Title dated August 26, 2016, from Ken Burke, CPA, Clerk of the Circuit Court & Comptroller. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
AJM	Reviewed electronic correspondence from the Trustee's Attorney, Jody L. Kava, from the Southern District of New York and responded with the attached order dismissing Neelam Taneja's case and requesting to appear telephonically for meeting of the creditors.	0.20 350.00/hr	70.00
10/5/2016 LOL	Conference with Mr. Manie regarding filing Motion to Dismiss in the Bankruptcy Court.	0.20 350.00/hr	70.00

Invoice No. 1

* * *

Neelam Uppal, M.D.

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
	hac vice to defend The Health Law Firm against several motions filed by Neelam Uppal.		
11/22/2016	DEM Revise letter to Judge James L. Garrity, United States Bankruptcy Court of New York with Attorney's changes.	0.20 150.00/hr	30.00
	DEM Revise letter to Clerk of Court, United States Bankruptcy Court of New York with Attorney's changes.	0.20 150.00/hr	30.00
	DEM Finalize letter to Clerk of Court, United States Bankruptcy Court of New York and send out via Priority Mail.	0.20 150.00/hr	30.00
	DEM Finalize letter to Judge James L. Garrity, United States Bankruptcy Court of New York and send out via Priority Mail.	0.20 150.00/hr	30.00
12/12/2016	DEM Review and analyze The Health Law Firm's Verified Opposition to Debtor, Neelam Taneja's Motion for Sanction Willful Violation of Automatic Stay; Revise Opposition for Attorney Indest's review.	0.80 150.00/hr	120.00
12/15/2016	DEM Finalize and File Opposition to Uppal's Motion for Sanction with New York Bankruptcy Court; Mail copy to Nellam Taneja.	0.50 150.00/hr	75.00
12/21/2016	DEM Conduct research on Bankruptcy docket to see additional pleadings that has been filed in case.	0.50 150.00/hr	75.00
1/5/2017	DEM Receive and review Second Proof of Claim by The Bank of New York Mellon fka The Bank of New co Nationstar Mortgage, Limited Liability Company; Save to file and pleadings folder for Attorney's use in case.	0.30 150.00/hr	45.00
	DEM Receive and review Uppal's proposed Order and exhibits; Discuss with legal team.	0.50 150.00/hr	75.00
1/12/2017	DEM Receive several pleadings in the Bankruptcy Case filed by nonparties, 2016-12356, unrelated to the collections matter; Save to file.	1.00 150.00/hr	150.00
2/13/2017	SE Receive Notice of a Hearing regarding Debtor's Motion to Extend the Automatic Stay dated February 8, 2017, from United States Bankruptcy Court. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
	SE Receive Notice of a Hearing regarding Nationstar Mortgage Objecting to Debtor's Request for Loss Mitigation dated February 6, 2017, from United States Bankruptcy Court. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
2/21/2017	SE Receive Summons and Notice of Pretrial Conference in an Adversary Proceeding from Neelam Uppal. Calendar reminders and deadline to File Answer to Adversary Complaint. Reviewed file to determine all appropriate locations for integration of document into file for most	0.40 150.00/hr	60.00

Neelam Uppal, M.D.

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
	efficient use by attorneys. Index document for filing. Advise attorneys of same.		
2/24/2017	SE Receive Order Denying Debtor's Motion for Continuation of the Automatic Stay Under Section 362(c)((3)(B) dated February 17, 2017. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
3/16/2017	GFI Review prior filings in bankruptcy case to determine prior background or pleadings and other pleadings by other parties in case we may be able to use in Adversary Proceeding.	2.00 550.00/hr	1,100.00
	GFI Review and analyze Chapter 7, federal bankruptcy rules of procedure, along with comments to same to determine appropriate responses and approaches to adversary proceeding commenced by Uppal.	3.00 550.00/hr	1,650.00
	GFI Review and analyze Uppal's "Adversary Proceeding for Violation of Automatic Stay" to identify any significant issues raised that may need addressing.	1.50 550.00/hr	825.00
3/17/2017	GFI Conduct legal research on bankruptcy adversary proceedings. Conduct legal research on issues raised Uppal in pleading.	2.30 550.00/hr	1,265.00
	GFI Conduct legal research on federal rules applicable to bankruptcy adversary proceedings, including reviewing the entirety of chapter 9, Federal rules of bankruptcy procedure, for application in this case.	2.60 550.00/hr	1,430.00
	GFI Go back through Uppal's pleading to identify false statements made in pleading, to excerpt them as quotations to include in our motion for summary judgment and alternative motion to dismiss. Work on section of motion dealing with striking false pleadings.	2.80 550.00/hr	1,540.00
	GFI Begin drafting motion for summary judgment and alternative motion to dismiss "adversary proceeding for violation of automatic stay" filed by Uppal. Start preparing background and facts section of motion.	3.00 550.00/hr	1,650.00
3/18/2017	GFI Continue working on motion for summary judgment and alternative motion to dismiss uppal's "adversary proceeding for violation of automatic stay" especially relating to allegations of false claims. Review and select documents from other state court pleadings files to include as exhibits in our.	3.00 550.00/hr	1,650.00
3/20/2017	TM Update, organize and index Pleadings File with Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternate Motion to Dismiss Neelam Taneja's Adversary Proceeding, for use by attorneys in case.	0.30 150.00/hr	45.00
	TM Update, organize and index Pleadings File with Creditor, The Health Law Firm's and George Indest's [sic] Memorandum of Law in support of Motion for Summary Judgment and Alternate Motion to Dismiss	0.30 150.00/hr	45.00

Neelam Uppal, M.D.

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
	Neelam Taneja's Adversary Proceeding, for use by attorneys in case.		
3/20/2017 TM	Prepared correspondence to Bankruptcy Trustee Jeffrey L. Sapir, to serve Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternate Motion to Dismiss Neelam Taneja's Adversary Proceeding, and Memorandum of Law on same, in seven separate e-mails due to document size limitations of destination e-mail.	1.90 150.00/hr	285.00
GFI	Prepare affidavit in support of motion for summary judgment.	1.30 550.00/hr	715.00
GFI	Continue working on Memorandum of law section of motion for summary judgment and motion to dismiss. Include arguments concerning rule 11 sanctions, and other relevant Federal Rules of Civil Procedure and Federal rules of bankruptcy procedure.	2.40 550.00/hr	1,320.00
GFI	Re-organize motion and supporting memorandum of law to separate into two different documents for filing purposes. Reword, revise and rewrite sections of motion for summary judgment and separate memorandum of law in support.	2.50 550.00/hr	1,375.00
SG	Organize, and bates stamp 151 pages of exhibits in anticipation of forwarding with Creditor, The Health Law Firm's and George Indest's (SIC) Memorandum of Law in Support of Motion for Summary Judgment and Alternate Motion to Dismiss Neelam Taneja's Adversary Proceeding, for use by attorneys in case.	0.30 150.00/hr	45.00
GFI	Continue working on draft of motion for summary judgment and alternative motion to dismiss. Add to and complete background and facts section of motion, more than 40 paragraphs.	2.80 550.00/hr	1,540.00
TM	Review and revise Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternate Motion to Dismiss Neelam Taneja's Adversary Proceeding, for use by attorneys in case.	1.10 150.00/hr	165.00
CCS	Conference with Mr. Indest regarding adversarial proceedings initiated by Dr. Uppal.	0.20 450.00/hr	90.00
3/23/2017 SE	Receive Notice of an Adjourned Hearing dated March 16, 2017, from United States Bankruptcy Court. Reviewed file to determine all appropriate locations for integration of document into file for most efficient use by attorneys. Index document for filing. Advise attorneys of same.	0.30 150.00/hr	45.00
3/27/2017 TM	Prepare CD with Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternative Motion to Dismiss Neelam Taneja's Adversary Proceeding, and Memorandum of Law on same, for enclosure with correspondence to Aubrey Elizabeth Posey, Esquire, Tankel Law Group.	0.30 150.00/hr	45.00

Neelam Uppal, M.D.

Page 7

		<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2017	TM Finalize, photocopy and forward correspondence to Aubrey Elizabeth Posey, Esquire, Tankel Law Group, forwarding Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternative Motion to Dismiss Neelam Taneja's Adversary Proceeding, and Memorandum of Law on same.	0.40 150.00/hr	60.00
	TM Prepare draft correspondence to Aubrey Elizabeth Posey, Esquire, Tankel Law Group, forwarding Creditor, The Health Law Firm's and George Indest's [sic] Motion for Summary Judgment and Alternative Motion to Dismiss Neelam Taneja's Adversary Proceeding, and Memorandum of Law on same, for use by attorneys in case.	0.60 150.00/hr	90.00
4/13/2017	CH Reviewed Summons and Notice of Pretrial Conference in an Adversary Proceeding dated February 16, 2017. Updated firm calendar, parties list and pleadings index for use by attorney in case.	0.20 150.00/hr	30.00
4/17/2017	CH Conduct legal research regarding proper rule citation to utilize in request for judicial notice in Southern District of New York Bankruptcy Court.	0.20 150.00/hr	30.00
4/18/2017	CH Create pleadings index for Southern District of New York Chapter 13 Bankruptcy Adversary Proceeding. Organize, label and update pleading index with filed documents, for use by attorney in case.	0.40 150.00/hr	60.00
	CH Conduct legal research regarding telephonic appearance by attorney in case at Southern District of New York Adversary Proceeding Pretrial Conference to be held on May 4, 2017. Obtain and review Judge Garrity's Chamber Rules, for use by attorney in case. Verified Judge Garrity and Court Call contact information. Update electronic file with copies of the same.	0.70 150.00/hr	105.00
	CH Telephone conference with Southern District of New York Chapter 13 Bankruptcy Specialist regarding telephonic hearing appearance by attorney in case and assigned Judge Garrity's Chamber Rules.	0.20 150.00/hr	30.00
	CH Prepare draft of electronic correspondence to Chambers of Judge Garrity requesting telephonic appearance at Southern District of New York Adversary Proceeding Pretrial Conference to be held on May 4, 2017, for use by attorney in case. Review and attach electronic copies of pleadings complying with Judge Garrity's Chamber Rules requirements for telephonic appearances.	1.00 150.00/hr	150.00
For professional services rendered		74.20	\$27,710.00
Additional Charges :			
11/11/2016	Cost paid to Clerk, US Bankruptcy Court, SDNY for filing motion.		200.00
11/14/2016	Postage		0.94

Neelam Uppal, M.D.

Page 8

	<u>Amount</u>
11/22/2016 Postage	6.45
Postage	6.45
12/15/2016 Notarization	10.00
12/16/2016 Postage	1.36
<hr/>	
2/23/2017 Pacer cost regarding research to draft answer to adversary complaint.	3.10
3/6/2017 Online / Computer-Assisted Research on PACER.	2.10
3/23/2017 Postage	53.85
3/24/2017 Online / Computer-Assisted Research - PACER	1.70
Online / Computer-Assisted Research - PACER	3.00
4/13/2017 Research - PACER fees	16.30
4/18/2017 Online / Computer-Assisted Research - PACER fees	2.10
Online / Computer-Assisted Research	75.00
Total costs	<u>\$382.35</u>
Total amount of this bill	<u>\$28,092.35</u>
Balance due	<u><u>\$28,092.35</u></u>

NOTES:

Please make your check payable to "The Health Law Firm."

Pursuant to this firm's billing policies and our standard terms of representation, the balance is due and payable upon receipt. 1% per month interest will be charged after 21 days.

Note: Please check this invoice immediately and let us know if there are any errors on it or if there are any adjustments which should be made. Otherwise, in accordance with Franklin & Marvin, P.A., v. Mascola, 711 So.2d 46 (Fla. 4th District Court of Appeals 1998) it will be presumed to be correct.

SUMMARY SHEET FOR ADVERSARY ACTIVITIES ONLY - FROM INVOICE 2

(Only From Invoice No.: 43687, 2/24/2017 through 7/1/17) =B

Neelam Uppal v. Health Law Firm George Indest; Bankruptcy Case No.: 16-12356-jlg;
Adversary Proceeding No.: 17-01027-jlg

LEGAL PROFESSIONAL FEES FOR ADVERSARY PROCEEDING (Invoice 2):

<u>Init.</u>	<u>Name</u>	<u>Position</u>	<u>Hrs.</u>	<u>Rate</u>	<u>Amount</u>
GFI	George F. Indest III	Managing Partner	74.6 hrs	\$475/hr	\$35,435.00
GFI	George F. Indest III	Managing Partner	11.0 hrs*	\$475/hr	\$ 5,225.00
	TOTAL		85.6 hrs*		\$40,660.00

COSTS (Invoice #2):

Postage: \$ 97.61
Photocopies: \$ 147.50
Travel: \$2,858.80*
Legal Research: \$ 201.42
Travel Credit: (400.00)

Total Costs **\$2,905.33**

(* Includes projected time and travel costs for attending hearing on 7/13/2017)

The above was compiled and verified by:


MICHELLE WILLIAMS
ASSISTANT BOOKKEEPER
THE HEALTH LAW FIRM

INVOICE 2



The Health Law Firm
1101 Douglas Avenue
Altamonte Springs, FL 32714
Telephone: (407) 331-6620
Tax ID No.: 59-3609071

Invoice submitted to:
Neelam Uppal, M.D.
COLLECTIONS CASE

July 03, 2017

In Reference To: File No. : 1516/006X-AP

New York Bankruptcy-Adversary Complaint

Invoice #43687

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/24/2017	GFI Receive and review complaint and summons in adversary proceeding in case. Review and annotates same noting false statements and inconsistencies for later defense. Review court docket to ascertain correct defend dance for adversary proceeding and due date for response to summons.	2.00 475.00/hr	950.00
3/7/2017	GFI Research and review chapter 9 of Federal rules of bankruptcy procedure.	1.20 475.00/hr	570.00
	GFI Conduct legal research to obtain authority and cases on defense of adversary proceedings within bankruptcy cases.	1.00 475.00/hr	475.00
	GFI Research and review chapter 7 of Federal rules of bankruptcy procedure.	1.20 475.00/hr	570.00
	GFI Review and analyze annotations for bankruptcy procedure rules (approximately 50 cases) to ascertain possible defenses to complaints in adversary proceedings.	2.80 475.00/hr	1,330.00
3/8/2017	GFI Review prior pleadings and multiple different lower court cases and appellate court cases in which we were involved with debtor Neelam Taneja Uppal to be able to set forth statement of facts for motion to dismiss and motion for summary judgment.	2.20 475.00/hr	1,045.00
	GFI Continue to work on statement of background and facts for motion (approximately 40 paragraphs to date).	1.90 475.00/hr	902.50
	GFI Begin drafting statement of background and facts for use in motion to dismiss/motion for summary judgment in case.	2.40 475.00/hr	1,140.00

INVOICE 2

Neelam Uppal, M.D.

Page 2

			<u>Hrs/Rate</u>	<u>Amount</u>
3/10/2017	GFI	Identify documents from prior case files to use as possible motion exhibits and begin to compile index of exhibits for document.	1.60 475.00/hr	760.00
3/11/2017	GFI	Review various cases selected from LEXIS legal research and from bankruptcy rules annotated to include an and argue in memorandum of law in support of motion for summary judgment. Approximately 42 cases reviewed and analyzed for possible use.	2.70 475.00/hr	1,282.50
3/13/2017	GFI	Begin preparation of memorandum of law in support of motion to dismiss/motion for summary judgment in case.	2.20 475.00/hr	1,045.00
3/14/2017	GFI	Work on draft of affidavit of George F Indest III to file in support of motion for summary judgment/motion to dismiss adversary proceeding.	1.50 475.00/hr	712.50
3/15/2017	GFI	Continue to work on draft of motion to dismiss and motion for summary judgment to raise appropriate defenses in accordance with rule 12, Federal Rules of Civil Procedure and rule 9012, Federal Rules of Bankruptcy Procedure.	1.00 475.00/hr	475.00
	GFI	Continue to work on selection of documents to support motion for summary judgment and motion to dismiss as well as memorandum of law in support.	1.40 475.00/hr	665.00
3/17/2017	GFI	Complete and review affidavit and make final selection of all documents to be used as exhibits to support motion to dismiss/motion for summary judgment.	1.60 475.00/hr	760.00
3/20/2017	GFI	Review, finalize and execute affidavit in support of motion for summary judgment. Make changes to same, finalize.	0.50 475.00/hr	237.50
	GFI	Review, make final revisions to, finalize and execute motion to dismiss/motion for summary judgment to file in case.	1.40 475.00/hr	665.00
	GFI	Review, make final revisions to, finalize and execute memorandum of law in support of motion to dismiss/motion for summary judgment to file in case.	1.50 475.00/hr	712.50
4/15/2017	GFI	Conduct legal research and review annotations of cases under Rule 9011, Federal Rules of Bankruptcy Procedure. Review approximately 30 cases that appear to be somewhat on point with same.	1.80 475.00/hr	855.00
	GFI	Begin work on motion for sanctions in accordance with Rule 9011, Federal Rules of Bankruptcy Procedure and Rule 11, Federal Rules of Civil Procedure.	2.00 475.00/hr	950.00
4/18/2017	GFI	Continue to work on draft of motion for sanctions and attorney's fees pursuant to Rule 9011, Federal Rules of Bankruptcy Procedure, and memorandum of law in support of same.	2.00 475.00/hr	950.00
5/5/2017	GFI	Complete, review and correct motion for sanctions and attorney's fees pursuant to rule 9011, Federal rules of bankruptcy procedure, and memorandum of law in support of same. Execute same for service in	1.90 475.00/hr	902.50

Neelam Uppal, M.D.

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
	accordance with safe harbor provisions of rule.		
5/5/2017	GFI Prepare safe harbor letter to serve on Debtor Neelam Taneja Uppal and her legal counsel, Arlene Gordon-Oliver, Esq., and ascertain e-mail addresses and physical addresses to serve same. Finalize and execute safe harbor letter for service.	1.40 475.00/hr	665.00
5/24/2017	GFI Telephone conference with Colin M. Linsenman, Esquire, and George B. Wilkinson, Esquire, regarding case.	0.30 475.00/hr	142.50
5/29/2017	GFI Travel to New York for 06/01/17 hearing in U.S. Bankruptcy Court for the Southern District of New York on Motion for Summary Judgment and other matters.	4.00 475.00/hr	1,900.00
	GFI Prepare for hearing in U.S. Bankruptcy Court for the Southern District of New York on Motion for Summary Judgment and other matters on 06/01/17.	2.00 475.00/hr	950.00
5/30/2017	GFI Review, revise and execute final motion for sanctions and attorneys fees pursuant to rule 9011, Federal rules of bankruptcy procedure, for filing with court. Prepare additional certificate of service to comply with safe harbor provisions. Obtain receipts and certificates showing actual receipt by debtor and her attorney of original draft motion served on May 5. File motion with court.	1.30 475.00/hr	617.50
5/31/2017	GFI Travel from office and Altamonte Springs, Florida, to New York City to attend at journal hearing scheduled by the Court on Adversary Proceedings filed by Debtor Uppal.	5.00 475.00/hr	2,375.00
	GFI Conduct legal research on LEXIS to locate additional cases relating to summary disposition of adversary proceedings in bankruptcy cases and orders dismissing complaints and adversary proceedings. Identify three cases in particular which appear to apply to present proceedings and annotates same for use at hearing.	2.30 475.00/hr	1,092.50
	GFI Review all pleadings and assemble and organize hearing notebook for hearing on our motion to dismiss and motion for summary judgment for adversary proceedings filed by debtor Uppal.	3.70 475.00/hr	1,757.50
6/1/2017	GFI Travel from hotel to bankruptcy court in New York City. Await for case to be called by Judge Morris for hearing on our motions. Argue motions.	1.90 475.00/hr	902.50
	GFI Travel back to hotel from bankruptcy court in New York City after hearing, to check out.	0.80 475.00/hr	380.00
	GFI Travel back to office and Altamonte Springs, Florida from New York City.	7.60 475.00/hr	3,610.00
6/4/2017	GFI Review notes from hearing on 6/1/2017. Review motion to dismiss and relief requested therein. Review written instructions from Judge Morris's court on how to prepare and submit proposed orders. Research and locate sample proposed orders previously signed and	0.80 475.00/hr	380.00

Neelam Uppal, M.D.

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
	entered by Judge Morris. Prepare order to upload for Judge Morris to sign as per judge Morris's instructions. Upload same.		
6/28/2017	GFI Conduct legal research (Lexis) on bankruptcy fee cases for what constitutes "reasonable fee" and "reasonable hourly rate." Review and analyze approximately 25 cases. Select <u>Coalof Immokalee, Tatum, Lora</u> and additional cases (more than 100 pages) for further analysis and arguments to court.	2.20 475.00/hr	1,045.00
7/1/2017	GFI Work on and prepare affidavits of attorney's fees and additional filings associated with attorney's fees from bookkeeper.	2.00 475.00/hr	950.00
	GFI Research surveys available for New York Attorney Fees in Bankruptcy Cases for use in upcoming Rule 9011 Motion.	1.50 475.00/hr	712.50
7/12/2017	GFI *(Projected) Travel to New York for hearing	5.00 475.00/hr	2,375.00
7/13/2017	GFI *(Projected) Go to Bankruptcy Court, await calling of case. Appear on behalf of client in Bankruptcy Court.	1.00 475.00/hr	475.00
	GFI *(Projected) Return travel to office in Altamonte Springs, Florida from New York.	5.00 475.00/hr	2,375.00
	For professional services rendered	85.60	\$40,660.00
	Additional Charges :		
3/18/2017	Online / Computer-Assisted Research - Lexis Nexis charges.		38.92
4/18/2017	Transfer of costs incurred from 2/23/17 through 4/18/17 for Adversary Proceeding placed on invoice #41870.		157.15
	Online / Computer-Assisted Research - Lexis Nexis research.		101.26
5/5/2017	Postage		36.45
	Photocopies		77.50
	Postage		36.45
5/9/2017	Online / Computer-Assisted Research - Lexis Nexis		39.24
	Photocopies		53.50
5/22/2017	Online / Computer-Assisted Research - Lexis Nexis		19.20
5/24/2017	Conference call with Colin M. Linsenman, Esquire, and George B. Wilkinson, Esquire		12.34
5/24/2017-Postage			0.98
5/30/2017			

Neelam Uppal, M.D.

Page 5

	<u>Amount</u>
5/24/2017-Postage 5/30/2017	3.22
5/30/2017 Postage	13.30
5/31/2017 Travel expenses to New York for hearing. (Flight)	656.40
6/1/2017 Travel expenses from Altamonte Springs to New York, N.Y. (May 31, 2017 to June 1, 2017)	1,301.20
6/2/2017 Postage	3.64
Photocopies	12.00
6/5/2017 Online / Computer-Assisted Research - PACER	2.80
6/8/2017 Postage	1.47
6/12/2017 Postage	2.10
Photocopies	4.50
7/13/2017 *(Projected based on past travel) Travel expenses from Altamonte Springs to New York, N.Y.	901.20
Total costs	<u>\$3,474.82</u>
Total amount of this bill	<u>\$44,134.82</u>
7/1/2017 Credit for flight.	<u>(\$400.00)</u>
Total payments and adjustments	<u>(\$400.00)</u>
Balance due	<u><u>\$43,734.82</u></u>

NOTES:

Please make your check payable to "The Health Law Firm."

Pursuant to this firm's billing policies and our standard terms of representation, the balance is due and payable upon receipt. 1% per month interest will be charged after 21 days.

Note: Please check this invoice immediately and let us know if there are any errors on it or if there are any adjustments which should be made. Otherwise, in accordance with Franklin & Marvin, P.A., v. Mascola, 711 So.2d 46 (Fla. 4th District Court of Appeals 1998) it will be presumed to be correct.